

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GREENWOOD RACING INC., GREENWOOD
GAMING AND ENTERTAINMENT, INC.,
RACETRACK OP CO., CITY TURF CLUB OP
CO., TURF CLUB OP CO., and ACRA TURF
CLUB, LLC

Case No.: 2:21-cv-01682

Plaintiffs,

v.

AMERICAN GUARANTEE AND LIABILITY
INSURANCE COMPANY and STEADFAST
INSURANCE COMPANY,

Defendants.

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that the undersigned attorneys for Steadfast Insurance Company (“Steadfast”) hereby move before the Honorable Gerald J. Pappert, U.S.D.J., for an Order dismissing the Complaint with prejudice pursuant to Rule 12(b)(6); and

PLEASE TAKE FURTHER NOTICE that in support of this motion, Steadfast shall rely upon the attached memorandum of law.

Respectfully submitted,

**MOUND COTTON WOLLAN
& GREENGRASS LLP**
*Attorneys for Defendant
Steadfast Insurance Company*

Dated: April 30, 2021

/s/ William D. Wilson
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CERTIFICATE OF SERVICE

I, William D. Wilson, Esq., hereby certify that on April 30, 2021, I caused a true and correct copy of Steadfast's Motion to Dismiss the Complaint, including the accompanying memorandum of law in support thereof and proposed order, to be served via the Court's electronic filing system on all counsel of record.

Dated: April 30, 2021

/s/ William D. Wilson
William D. Wilson